IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF ILLINOIS

JAMES SCOTT,))
Plaintiff,	
v.	Case No. 22-CV-658-GCS
TRANSUNION, LLC, EQUIFAX INFORMATION SERVICES, LLC and LVNV FUNDING, LLC,	
Defendants.	

<u>DEFENDANT LVNV FUNDING, LLC'S UNOPPOSED MOTION FOR EXTENSION OF</u> <u>TIME TO RESPOND TO PLAINTIFF JAMES SCOTT'S COMPLAINT</u>

Defendant LVNV Funding, LLC, ("Defendant") by and through undersigned counsel, hereby move this Court the entry of an Order extending time to file a responsive pleading to Plaintiff James Scott's ("Plaintiff") Complaint until May 18, 2022.

In support of this Motion, Defendant states as follows:

- 1. Plaintiff filed his Complaint on March 31, 2022. LVNV Funding, LLC was served on or about April 6, 2022.
- 4. On April 25, 2022, Defendant's counsel contacted Plaintiff's counsel to request an extension until May 18, 2022 to file a responsive pleading.
- 5. On April 25, 2022, Plaintiff's counsel indicated there was no objection to the extension.
- 6. In addition, Defendant believes that an extension of the deadline for a responsive pleading will assist in providing additional time to investigate the matter and in filing a responsive pleading as well as attempt resolution of this matter.

7. An extension to May 18, 2022 will not prejudice any party at this early juncture.

WHEREFORE, Defendants respectfully requests that this Court enter an order extending time for it to file a responsive pleading to Plaintiffs' Complaint until May 18, 2022.

Dated this 25th day of April, 2022.

Respectfully submitted, BARRON & NEWBURGER, PC

/s/Nabil G. Foster

Nabil G. Foster

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CERTIFICATE OF SERVICE

I, Nabil G. Foster, an attorney, certify that I shall cause to be served a copy of **Defendant LVNV Funding, LLC's Motion for Extension of Time to Respond to Complaint** upon the following individual(s), by deposit in the U.S. mail box postage prepaid, messenger delivery, Federal Express, facsimile transmitted from (312) 229-9203, or electronically via email or the Case Management/Electronic Case Filing System ("ECF") as indicated, on April 25, 2022.

X	CM/ECF	Attorney for Plaintiff
	Facsimile	Yaakov Saks
	Federal Express	Stein Saks, PLLC
	E-Mail	One University Plaza, Suite 620
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s/Nabil G. Foster

Nabil G. Foster One of the Attorneys for Defendant